

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:**

**INNOVATE LABS LLC,**

**Debtor.**

**Chapter 7**

**Case No. 24-12283 (JKS)**

**NOTICE OF EXAMINATION PURSUANT TO FED. R. BANKR. P. 2004**

**TO: Nicholas Parseghian, Managing Director  
CBIZ, Inc.  
53 State Street, 17th Floor  
Boston, MA 02109**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 2004 and Local Bankruptcy Rule 2004-1, Alfred T. Giuliano, Chapter 7 Trustee (the “Trustee”) of the Estate of Innovate Labs LLC (“Innovate”), by and through his attorneys, will take the deposition by oral examination of **Nicholas Parseghian** before a person duly authorized to administer oaths on **Thursday, December 4, 2025, commencing at 10:00 a.m. EST** and continuing until completed. The deposition will be conducted via Zoom (or other similar remote technology acceptable to the parties) and will be recorded by stenographic means.

The examinee will testify concerning the following Subjects for Examination:

1. Services performed by Marcum LLP (“Marcum”) in connection with Innovate’s engagement of Marcum pursuant to the Engagement Letter dated February 14, 2022.
2. Marcum’s estimation of the fair market value of Innovate.
3. Marcum’s interactions with representatives of Innovate and Brave New Software Project, Inc., including but not limited to Adam Fisk, Niall Donnelly, and Mary Hayes (*nee* Tiller).

4. Any and all matters relating to the Documents sought from and/or produced by CBIZ in connection the Trustee's Rule 2004 Request.

Date: November 25, 2025

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Chapter 7 Trustee*

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on the date set forth below, the foregoing Notice of Examination Pursuant to Fed. R. Bank. P. 2004 (the “Notice”) was filed with the Court using its CM/ECF system and will therefore be served via ECF notification on all counsel who have entered an appearance in this case. The undersigned further certifies that, on the date set forth below, the foregoing Notice was served via email on all parties required by Local Bankruptcy Rule 2004-1(c).

/s/ Seth A. Niederman

Seth A. Niederman (DE 4588)